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July 112, 2012

**VIA ECF**

Hon. Dora L. Irizzary  
United States District Court  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: United States v. Frangipane**  
**Docket No. 11 CR 3 (DLI)**

Dear Judge Irizzary:

We submit this letter motion seeking partial modification of the defendant's current release conditions, of home confinement curfew except for 5:00 a.m. to 7:30 p.m. during the week (and Wednesday and Sunday nights from 8:00 p.m. to 11:00 p.m. to close his fiancé's business) to include:

1. July 14, 2012 from 1 p.m. to 9 p.m. to attend a cousin's high school graduation, with his mother, in Commack, New York.

2. July 24-26, 2012 to travel to Beach Haven, New Jersey (Long Beach Island) on July 24, 2012 and stay at the Engleside Inn with his fiancé and three children for a family vacation including his father, his three children from his first marriage, stepsisters and nieces.

3. July 28-29, 2012 to attend an overnight Boy Scout trip with his fiancé and her son on the Intrepid in New York City.

4. Every other Saturday from 9 a.m. to 2 p.m. as additional personal time to take care of personal shopping, auto repairs, haircuts, etc. and office paper work which he is unable

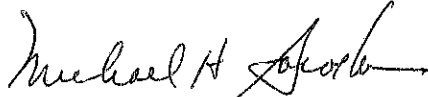
Hon. Dora L. Irizzary  
July 12, 2012  
Page 2

to complete since he leaves for work at 5:00 a.m. and returns about 7:30 p.m. each night.

Pre Trial Services Agency Supervisor Patrick Mancini states his agency is neither objecting nor endorsing the application and Assistant U.S. Attorney Knapp has advised that the government does not oppose this request.

If our application meets with your approval, would you kindly have Chambers forward me a copy of this letter as endorsed by the Court - or I will obtain a copy if filed on the ECF system. I will thereafter provide Pre Trial Services with a copy of the order.

Very truly yours,

A handwritten signature in black ink, appearing to read "Michael H. Soroka", with a stylized flourish at the end.

Michael H. Soroka

MHS:jv

cc: Whitman Knapp, Esq./via ECF  
Patrick Mancini /via fax 718-712-6451  
Michael Ilaria /via fax 718-613-2488  
Thomas Frangipane